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March 24, 2025

Via ECF

Hon. Margo K. Brodie
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Anisimova v. Village Practice Management Company, LLC d/b/a CityMD*

Dear Judge Brodie:

I represent Plaintiff Sofiya Anisimova (“Plaintiff”) in the above-captioned matter. Together with counsel for Defendant, the parties write pursuant to Section 2(A) of Your Honor’s Individual Practices and Rules to jointly request a brief stay of proceedings pending Defendant’s motion to transfer in the case captioned *In re CityMD Privacy Litigation*, 2:24-cv-06972 (D.N.J.). As explained in Defendant’s February 24, 2025 Letter (Doc. 19), *In re CityMD Privacy Litigation* is a consolidated class action involving overlapping facts and allegations to the instant matter. On February 18, 2025, Defendant moved to transfer *In re CityMD Privacy Litigation* to this District, and the motion will be fully briefed by April 4, 2025.

Since the filing of Defendant’s February 24, 2025 Letter, the parties have continued to meet and confer about the propriety of a stay pending the outcome of Defendant’s motion to transfer *In re CityMD Privacy Litigation* to this District. To that end, the parties agree that a brief stay of proceedings here is appropriate because, absent a stay, it is likely the Court and parties will likely expend unnecessary time and resources while the transfer motion remains undecided.

Accordingly, subject the Court’s approval, the parties respectfully request a stay of proceedings, including a stay of the Initial Conference on May 27, 2025 and associated deadlines to the extent a ruling is not issued on the transfer motion prior to preparation for the conference. The parties propose that, within seven (7) days of a ruling on the *In re CityMD Privacy Litigation* transfer motion or 14 days prior to the Initial Conference on May 27, 2025, whichever is earlier, they will submit to the Court an update of the case, including a revised motion to dismiss briefing schedule and/or a proposed Initial Conference date, as appropriate.

The parties thank the Court for its consideration to this matter.

Respectfully,
/s/ Alec M. Leslie

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